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Via ECF

January 19, 2023

Judge Rachel P. Kovner
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: *United States v. Klein*, No. 1:22-cr-00475-RPK

Dear Judge Kovner:

I represent Bernard Klein in the matter of *United States v. Klein*, No. 1:22-cr-00475-RPK. I am writing to respectfully notify the Court of Mr. Klein's previously approved travel and to request the Court's leave concerning additional travel outside the Eastern District of New York.

Mr. Klein is currently subject to supervised release pursuant to the Amended Judgment entered in his case. *See* ECF 1. The "Standard Conditions of Supervision" applicable to Mr. Klein's supervised release include the requirement that he "not knowingly leave the federal judicial district where [he is] authorized to reside without first getting permission from the court or the probation officer." ECF 4 at 25. Accordingly, I am writing to ensure that you are apprised of the travel that Judge William E. Smith of the District of Rhode Island and the U.S. Probation Office have previously approved and, pursuant to the instruction of Mr. Klein's probation officer, to request the Court's permission for Mr. Klein to travel outside the district.

Mr. Klein has been granted permission to make two trips outside the New York area. First, on October 14, 2022, U.S. Probation Officer Vincent Danielo notified Mr. Klein that Judge Smith had granted Mr. Klein permission to travel to Israel from February 27 to March 5, 2023. Officer Danielo later confirmed that Mr. Klein was permitted to extend his trip to March 6, 2023. Second, on January 5, 2023, U.S. Probation Officer Lisa Famularo notified Mr. Klein that he was permitted to travel to Miami from January 29 to February 1, 2023.

Following the transfer of Mr. Klein's case to this Court, Officer Famularo instructed Mr. Klein to seek permission for additional travel directly from the Court. Accordingly, Mr. Klein is now seeking the Court's permission to travel with his family to Italy for the Passover holiday, from April 3 to April 17, 2023.

In addition, the terms of Mr. Klein's release require him to "work full time . . . at a lawful type of employment," ECF 4 at 25, and Mr. Klein's work requires him to make



regular trips to Manhattan. Mr. Klein therefore seeks the Court's leave to travel to Manhattan without seeking permission for individual trips into the city.

Finally, we respectfully request that the Court permit Mr. Klein to seek authorization to engage in other local travel outside the Eastern District of New York from his probation officer alone, rather than seeking the Court's approval.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, which appears to read "Jeff Ifrah", is positioned above the typed name.

Jeff Ifrah
Ifrah Law